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6 Attorneys for Defendants  
7 City of Walnut Creek; Walnut Creek Police Sergeant Ryan  
Hibbs; Walnut Creek Police Officer Lee Herrington; Walnut  
8 Creek Police Officer Adams; and Walnut Creek Police Officer  
Ashley Roskos

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

13 PAUL ALFRED SINCERNY,

14 Plaintiff,

15 vs.

16 City of Walnut Creek; Walnut Creek Police  
17 Department; Walnut Creek Police Sergeant  
Ryan Hibbs; Walnut Creek Police Officer  
18 Lee Herrington; Walnut Creek Police  
Officer Brookshire; Walnut Creek Police  
19 Officer Adams; Walnut Creek Police  
Officer Ashley Roskos; Walnut Creek  
20 Police Officer Njoroge; Walnut Creek  
Police Officer Steve Bertolozzi; Walnut  
21 Creek Police Detective Kim Gerstner;  
Walnut Creek Police Officer Scott  
22 Moorhouse; Walnut Creek Police Chief  
Tom Chaplin, and DOES 1-20,

23 Defendants.  
24

Case No. C17-02616 HSG

**STIPULATION AND ORDER  
DISMISSING ENTIRE ACTION, WITH  
PREJUDICE**

25 The relevant parties, by and through their respective attorneys of record, hereby stipulate  
26 and jointly request an Order from the Court to a dismissal of the Plaintiff's Complaint, namely  
27 the entire action, against Defendants City of Walnut Creek; Walnut Creek Police Sergeant Ryan  
28 Hibbs; Walnut Creek Police Officer Lee Herrington; Walnut Creek Police Officer Adams; and  
STIPULATION AND ORDER DISMISSING  
ENTIRE ACTION, WITH PREJUDICE - C17-  
02616 HSG

Walnut Creek Police Officer Ashley Roskos, and any and all other named parties, with prejudice.  
Each party agrees to bear its own fees and costs as to this dismissal.

The parties attest that concurrence in the filing of these documents has been obtained from each of the other Signatories, which shall serve in lieu of their signatures on the document.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: June 8, 2018

HELBRAUN LAW FIRM

By: /s/ Helbraun, David M

David M. Helbraun  
Attorney for Plaintiff  
Paul Alfred Sincerny

Dated: June 8, 2018

MCNAMARA, NEY, BEATTY, SLATTERY,  
BORGES & AMBACHER LLP

By: /s/ Blechman, Noah G.

Noah G. Blechman  
Amy S. Rothman  
Attorneys for Defendants  
City of Walnut Creek; Walnut Creek Police Sergeant  
Ryan Hibbs; Walnut Creek Police Officer Lee  
Herrington; Walnut Creek Police Officer Adams; and  
Walnut Creek Police Officer Ashley Roskos

**ORDER**

**PURSUANT TO STIPULATION AND REQUEST, IT IS ORDERED AS FOLLOWS:**

The Court hereby dismisses this entire action, with prejudice, as to all claims alleged by Plaintiff. Each party to bear its own fees and costs as to this dismissal.

IT IS SO ORDERED

Dated: June 12, 2018

By: Haywood S. Gilliam, Jr.  
Hon. Haywood S. Gilliam, Jr.  
U.S. District Court Judge